

BECOMING AN ANTI-RACIST ORGANISATION

A GUIDE FOR PRIVATE SECTOR APPRENTICESHIP
COMMISSIONED CONTRACT HOLDERS IN WALES

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DEFINITIONS

Anti-racism

The Welsh Government defines anti-racism as: "Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups. It involves acknowledging that even when we do not regard ourselves as 'racist' we can, by doing nothing, be complicit in allowing racism to continue. It is not about "fixing" ethnic minority people or communities, but rather about fixing systems that have not benefited and at times even damaged ethnic minority people. It is about working with the considerable strengths and leadership of ethnic minority people and using their lived experiences in how we, collectively, shape and deliver. It is about making a positive and lasting difference."¹

Collective Experience of Racism

The Welsh Government uses the terms "Black, Asian and Minority Ethnic" along with 'ethnic minorities' as a short version when it is necessary to refer to the collective experience of racism. Wherever possible, the term people is used over communities."²

Institutional Racism

The Welsh Government adheres to the formal definition of institutional racism defined in the Macpherson report (1999): "The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. The report argues that institutional racism can be seen or detected in processes, attitudes, and behaviours that amount to discrimination through prejudice, ignorance, thoughtlessness, and racist stereotyping which disadvantages minority ethnic groups."³

TERMINOLOGY

CCH

The acronym CCH refers to the four private sector commissioned contract holders with whom the Welsh Government contracts for the delivery of learning programmes for apprenticeships.

Learner

The term learner refers to apprentices.

Policy

The term 'policy' is used when referring to organisational strategies, policies and procedures.

Recruitment processes

The term 'recruitment processes' is used when referring to all stages of recruitment to a role. i.e. person /search specifications and job descriptions, advertising/commissioning, application process, long/shortlisting, interview/assessment centres, appointment, on boarding/induction etc.

NOTES

All footnotes in relation to the *Introduction to the Anti-racist Wales Action Plan* and the *Anti-racist Wales Action Plan* refer to the PDF versions of these documents.

1. Anti-racist Wales Action Plan, June 2022, page 10.

2. Anti-racist Wales Action Plan, June 2022, page 12.

3. Anti-racist Wales Action Plan, June 2022, page 10.

BECOMING AN ANTI-RACIST ORGANISATION: A GUIDE FOR CCHS

1. INTRODUCTION

- 1.1 Welcome to this practice guide which aims to assist CCHs in taking intentional action to become truly equitable, anti-racist organisations for the benefit of all their learners, staff and wider stakeholders. It also will be of help to CCHs when developing their Anti-racist Action Plan.

The backdrop to the guide is the Welsh Government's ambition of becoming an anti-racist nation by 2030 and their comprehensive plan for doing so: the Anti-racist Wales Action Plan. The plan aims to create a nation where everyone thrives and set outs the roadmap for achieving this.

There is much work to do to eradicate the racism Black, Asian and Minority Ethnic people experience in everyday life, when experiencing service delivery, in being part of the workplace, in gaining jobs and opportunities, when they lack visible role models in positions of power, and as a refugee or asylum seeker.⁴ The Anti-racist Wales Action Plan makes clear that acting to eradicate racism is everyone's responsibility and to everyone's benefit.

"Racism is constantly mutating. If we fail to eradicate it, it will continue through generations. It becomes a perverse inheritance that expresses itself in different mutations, and that blights the lives of future generations in different ways... We want to eradicate racism and we believe that adopting an anti-racist approach is the key to this."

Professor Emmanuel Ogbonna, Cardiff University,
Co-Chair Anti-racist Wales Action Plan Steering Group

"Like Martin Luther King, I too have a dream...That all the children of Butetown will live in a world free from pollution, free from racism and full of opportunities. And I am sure that this dream is held by everyone for all children."

Betty Campbell, Headteacher

WHAT IS THE CONTEXT FOR THE GUIDE?

An Anti-Racist Wales

- 1.2 The guide is designed to assist CCHs in:
- Identifying and addressing their organisational priorities for becoming anti-racist.
 - Meeting their obligations to provide equitable learning and work opportunities and environments that enable everyone to realise their full potential.

The initial steps for meeting these obligations are set out in the Antiracist Wales Action Plan. They are concerned with:

- addressing underrepresentation of and inequitable outcomes for Black, Asian and Minority Ethnic learners on apprenticeship programmes,
- addressing underrepresentation of Black, Asian and Minority Ethnic staff at all levels within the workforce, and
- ensuring learning and work environments are free from racial bullying, harassment and discrimination.

- 1.3 The Anti-racist Wales Action Plan's goals and actions for apprenticeship providers are evidenced through quantitative data, for example on participation by and outcomes for learners and workforce representation, and qualitative data including the lived experience of Black, Asian and Minority Ethnic people. Both quantitative and qualitative data identify

4. Anti-racist Wales Action Plan, June 2022, page 15.

that apprenticeship provision needs to improve. In terms of quantitative data, Black, Asian and Minority Ethnic people identified when contributing to the creation of the Anti-racist Wales Action Plan that apprenticeship schemes did not address their needs.”⁵ This lived experience is reflected in quantitative data for apprenticeships which show that whilst participation rates for new Black, Asian and Minority Ethnic starts significantly increased (from 4.9% in 2021/22 to 10.2% in 2022/23⁶ comparing favourably with the ethnic demographic of Wales), outcomes for Black, Asian and Minority Ethnic learners remained below those for white learners (ranging from 2.0% to 12.0% lower depending on group in 2022/23).⁷ There are also racial inequities in staffing. The Education Workforce Council’s (EWC) data show underrepresentation of Black, Asian and Minority Ethnic work based learning practitioners in the workforce (2.6% vs 6.3% compared with the Black, Asian and Minority Ethnic population of Wales).⁸ Racial inequities in outcomes for learners and workforce representation exist within all CCHs, although the extent of these inequities varies between CCHs (all, however, report they have no Black, Asian and Minority Ethnic managing directors or senior leaders). In relation to participation, the rates for Black, Asian and Minority Ethnic learners generally show improvement but are higher in some CCHs than in others. Both lived experience and statistical data show CCHs have considerable work to do in relation to addressing racial inequities in outcomes for learners and workforce representation and in building on the progress made in learner participation. Addressing inequities in participation and outcomes for Black, Asian and Minority Ethnic learners have been long standing priorities⁹ and remain key objectives in the Anti-racist Wales Action Plan, along with increasing workforce representation.

- 1.4 There are three sections of the Anti-racist Wales Action Plan that apply to CCHs– leadership, education (work based learning) and employability and skills. Paragraphs 1.5 – 1.7 below provide more detail of CCHs’ obligations in relation to each section of the plan.

Leadership

- 1.5 The Anti-racist Wales Action Plan contains five core actions for leadership responsibility¹⁰ which must be met by all public, private and third sector organisations funded by Welsh Government. The core actions are:
- Core Action 1: A strong commitment to lead from the front and demonstrate it in terms of anti-racist values, behaviours, representation at all levels of organisations and accountability measures.
 - Core Action 2: Participation in all decision making and senior leadership groups in a way that enables lived experiences of ethnic minority people to be heard and acted upon.
 - Core Action 3: Achieve, at the very least, the minimum requirements of the Equality Act 2010 and publish the organisation’s results in an open and accessible forum/platform.
 - Core Action 4: Ensure minimum standards and provision of culturally sensitive and appropriate services, including provision of translation and interpretation.
 - Core Action 5: Ensure robust complaints policies and processes for racial harassment that are validated to the satisfaction of ethnic minority groups.

Work based learning

- 1.6 The Anti-racist Wales Action Plan has a number of goals for work based learning. These goals are within the education section of the plan (further education and work based learning).¹¹ It is important to note that whilst some of the actions for staffing in this section of the plan are the responsibility of other organisations, CCHs play a key role in achieving the outcomes for these actions by ensuring their systems and processes support the collection of full, accurate staffing ethnicity data.

Staffing

- To ensure that clear information is available about the ethnicity of staff at all levels in FE and WBL, and that staff are supported to progress in their careers regardless of ethnicity.
- To increase the numbers of representatives from Black, Asian and Minority Ethnic communities training to become FE and WBL practitioners.
- To increase levels of self-identification from ethnic minority people and increase confidence in sharing data.

5. An introduction to an Anti-racist Wales Action Plan, June 2022, page 14.

6. Apprenticeship learning programme started by quarter, year and ethnicity, Stats Wales data 2021/22 and 2022/23.

7. Success in apprenticeships, by academic year and ethnicity, Stats Wales data 2021/22 and 2022/23.

8. Annual Education Workforce Statistics for Wales Report, 2023, EWC, page 52.

9. Work-Based Learning Equality, Diversity and Inclusion Strategy 2020-2026, NTfW, December 2020.

10. Anti-racist Wales Action Plan, June 2022, page 28.

11. Anti-racist Wales Action Plan, June 2022, pages 49 -50 and page 52.

Addressing the experience of racism

- The participation, outcomes and progression of learners from different ethnic backgrounds are systematically monitored and action taken to address inequalities.

Apprenticeships

- 1.7 The Anti-racist Wales Action Plan's specific goal for apprenticeships is included in the employability and skills section of the plan. This goal is about increasing the number of ethnic minority people starting and completing apprenticeships.¹² The specific actions to support achievement of the goal include collecting, evaluating, acting upon and reporting on ethnicity data, sharing and publishing practice and producing and publishing case studies of Black, Asian and Minority Ethnic learners' achievements.¹³

WHAT IS THE PURPOSE OF THE GUIDE?

- 1.8 This guide is a practical resource to assist each CCH in setting targets and taking intentional, purposive action to
- a) redress any racial inequities in their systems, structures, processes and practices that adversely affect the experiences and prospects of Black, Asian and Minority Ethnic people,
 - b) redress any racial inequities in participation and outcomes for learners and in workforce representation, and
 - c) become an anti-racist organisation.

It covers the foundation– the 'must haves'– for organisational and cultural change that will make a long-lasting positive difference to people's lives.

WHO IS THE GUIDE FOR?

- 1.9 The guide is aimed primarily at people with leadership responsibilities, from managing directors and senior leaders through to team leaders and leaders of learning. Leaders have both the agency and influence to drive cultural and organisational change. It is incumbent on leaders to engage all stakeholders (e.g. learners, staff, partners, subcontractors, community and employers) in co-creating solutions. In particular, leaders need to engage Black, Asian and Minority Ethnic stakeholders, involving them in the decision making process to ensure their lived experiences are heard and acted upon.¹⁴

WHAT DOES THE GUIDE INCLUDE?

- 1.10 The first four sections of the guide are
- Section 1: Leadership (this section will be of help when completing Goal 1 and Goal 3 of the CCH Anti-racist Action Plan).
 - Section 2: Learning programmes (this section will be of help when completing Goal 2 of the CCH Anti-racist Action Plan).
 - Section 3: Organisational systems, policies and ways of working (this section will be of help when completing Goal 3 of the CCH Anti-racist Action Plan).
 - Section 4: Data (this section will be of help when completing Goal 4 of the CCH Anti-racist Action Plan).

Each of these sections includes the foundation for becoming an anti-racist organisation, supported by links to examples of practice, research and other literature and to the Anti-racist Wales Action Plan.

- 1.11 Section 5 provides guidance on working with subcontractors and employers and Section 6 on action planning. Appendix 1 contains further guidance on the Core Actions for Leadership and Appendix 2, the bibliography, reading list and links to useful websites.

HOW SHOULD THE GUIDE BE USED?

- 1.12 The guide does not provide a 'quick fix' for becoming an anti-racist organisation nor should it be used as a checklist. The contents of each section are intended to provide information about and guidance on the foundation policies, practices and processes that will support CCHs in becoming anti-racist organisations. Each CCH will be at a different stage in their anti-racism journey and the guide provides prompts for understanding key challenges, identifying

12. Anti-racist Wales Action Plan, June 2022, page 104.

13. Ibid.

14. Anti-racist Wales Action Plan, June 2022, page 28.

priorities and agreeing actions to take the organisation forward. Leaders should use the guide to inform conversations with stakeholders within and beyond the organisation to engage them in the process of change.

- 1.13 Becoming an anti-racist organisation takes time and requires a concerted effort and collective commitment. It involves everyone - from managing directors, senior leaders and team leaders through to staff and learners. It also requires 'buy in' to anti-racist organisational culture, values and behaviours from the subcontractors and employers with whom the CCH works.
- 1.14 The information and links to current think pieces and practice in this guide are meant to be shared throughout the organisation and with subcontractors to raise awareness of and discussion about what it means to be anti-racist - of being more than non-racist, of the need to take intentional action to eradicate racism for the benefit of everyone.

"In a racist society, it is not enough to be non-racist. We must be anti-racist."

Angela Davis, Professor Emerita, University of California, Santa Cruz

SECTION // 1

LEADERSHIP



Leadership of anti-racism matters. Leaders shape their organisation's vision, strategic direction, values, culture and behaviours. Their actions have a far-reaching, lasting effect on the experiences of their staff, learners and communities.

The process of organisational and cultural change needs to be led from the top by directors, senior leaders and other key influencers, and involve all teams and engage all stakeholders. This section of the guide sets out the foundation needed for leadership of anti-racism. It relates to creating the strategic vision and organisational culture, tone and behaviours that will support transformative change.

"We believe that the leadership challenge that permeates all the goals and actions is to reveal the systems and processes that have a negative impact on ethnic minority people, and to do something active, bold and different to tackle these. It requires leaders to reflect, and to tackle the "cause behind the cause."

Anti-racist Wales Action Plan

Leadership

Objective	Prompts: Leaders
Anti-racism is promoted throughout the organisation.	<ul style="list-style-type: none"> • State their and the organisation's commitment to racial equity and anti-racism and communicate this to learners, staff and wider stakeholders through clear, consistent messaging. • Seek the views of stakeholders within and beyond the organisation on current practice and the action needed to become an anti-racist organisation, with particular regard to the lived experiences of Black, Asian and Minority Ethnic stakeholders. • Promote the organisation's commitment to racial equity and anti-racism on an open, accessible forum/platform. • Ensure subcontractors publish public racial equity and anti-racism statements that adhere to the CCH's anti-racism principles. • Celebrate and profile the achievement of learners, staff and communities from the organisation's constituent ethnic groups. • Establish networks and partnerships with the organisation's diverse communities and profile these. • Undertake regular evaluations, internally and externally, to measure perceptions of the organisation's commitment to racial equity and anti-racism, and the impact of actions taken on the experiences of learners, staff and communities.

Lived Experience: Listening to Black, Asian and Minority Ethnic Stakeholders

Lived experience is a powerful force for change. Whilst quantitative data can help to establish that there are differentials in, for example, outcomes by ethnic background they do not identify why these differentials exist. Qualitative data, particularly lived experience data, explain both the 'why' and the 'how'. Within the context of organisations becoming anti-racist, lived experience of both racism and what it means to be anti-racist will provide insight into the underlying reasons for any differentials and how best to address these.

There are a number of ways to engage individuals and groups in telling their stories. These all involve asking Black, Asian and Minority Ethnic people to reflect on and share their experiences, both past and present. Methods include:

- Paper based and online surveys.
- Face to face interviews, in person or virtual.
- Focus groups, in person or virtual.
- Internal and external networks, advisory boards and representative bodies.

Whichever method or combination of methods used, the process needs to be shaped, directed and led by those with the prerequisite insight and expertise in anti-racism, including lived experience of racism.

Senior leaders need to ensure that stakeholders feel safe in sharing experiences and telling their stories. Safety encompasses maintaining confidentiality, providing safe spaces and having confidence in those conducting lived experience surveys, interviews and focus groups.

The BLG's Action Research, "Listening to *Black Student and Staff Voices" [BLG-Conference-2024_Lived-Experience-Report_March2024.pdf](#) (blackleadershipgroup.com) is a useful reference point for holding lived experience conversations and includes examples of questions and topics for discussion. The Welsh Government commissioned report on lived experience, "Towards Anti-racist Further Education: Qualitative research on the lived experience of learners and staff" [towards-anti-racist-further-education-qualitative-research-on-the-lived-experiences-of-learners-and-staff.pdf](#) (gov.wales) provides initial insights into the experiences of learners and staff in further education in Wales, including apprenticeship provision and is a useful starting point for further conversations.

Objective	Prompts: Leaders
Organisational culture and behaviours ensure fair, equitable treatment of Black, Asian and Minority Ethnic learners, staff and communities.	<ul style="list-style-type: none"> • Examine their beliefs and behaviours, making an honest assessment about the extent to which they model anti-racism and place it at the heart of the organisation. • Get feedback on the impact of their behaviours, role, decisions and wider organisation systems and practices on the lived experiences of stakeholders, particularly Black, Asian and Minority Ethnic stakeholders. • Take responsibility for educating themselves on what it means to be anti-racist and for enacting change. • Understand, if a white leader, what allyship means and entails, and assume that role. • Recognise and address biases, behaviours and organisational culture that create a hostile environment for Black, Asian and Minority Ethnic people. • Call out racism and take action to eradicate it, recognising that being non-racist is not enough. • Challenge personal and organisational assumptions that are barriers to equitable practice. • Ensure everyone in the organisation undertakes training on what it means to be anti-racist and how to challenge racism.

Examples of assumptions that act as barriers to equitable practice

"We don't have many Black, Asian and Minority Ethnic learners, so addressing racism isn't a priority." "We treat everyone equally and educate about respect for difference." Assumptions such as these create barriers on numerous levels– barriers to calling out racism, to recognising that racial inequities exist and need to be addressed, in teaching about racism and what it means to be anti-racist and in preparing learners for working in an increasing ethnically diverse society. (Examples of assumptions are from the Anti-racism charter: Framework for developing an anti-racist approach, NEU, April 2022, page 7.)

A useful video resource for staff and learners looks at how a single story about people, cultures and nations creates false narratives and perceptions: "The danger of a single story", a TED talk by Chimamanda Ngozi Adichie, July 2009 https://www.ted.com/talks/chimamanda_ngozi_adichie_the_danger_of_a_single_story?subtitle=en

Business in the Community has produced a useful toolkit on being an ally: [bitc-toolkit-race-allyshipguide-august20.pdf](#)

Objective	Prompts: Leaders
<p>The organisation's vision, values and objectives for anti-racism have been co-designed with stakeholders and are widely promoted.</p>	<ul style="list-style-type: none"> • Develop the vision, values and objectives for anti-racism, co-designed by stakeholders with particular regard to engagement of Black, Asian and Minority Ethnic stakeholders in this process. • Ensure the vision, values and objectives reflect the Anti-racist Wales Action Plan's goals and address racial inequities raised by the organisation's stakeholders. • Bring an anti-racism lens to the development of the vision, values and objectives and where internal insights and expertise are not available, draw on people, networks and/or organisations with expertise in anti-racism and lived experience of racism. • Ensure organisational racial equity and anti-racism objectives clearly set out the actions the organisation will take to eradicate racism and tackle racial inequities wherever they exist, e.g., in structures, systems, processes, practices, experiences and/or outcomes. • Publish, on an open, accessible platform, a statement that sets out the vision, principles, values and objectives for racial equity and anti-racism and the action the organisation intends to take.
<p>The organisation has set a transformative agenda for becoming an anti-racist organisation, co-designed with stakeholders.</p>	<ul style="list-style-type: none"> • Undertake initial evidence-based assessments of where the organisation currently stand in relation to racial equity and anti-racism (including where they stand in relation to the Anti-racist Wales Action Plan's goals and actions) and identify priorities for action. • Build a robust evidence base of quantitative and qualitative data, including Black, Asian and Minority Ethnic stakeholders' lived experience. • Use the outcomes from evidence-based assessments to identify actions for eradicating racial inequities and achieving the CCH's anti-racism objectives. • Consult with learners, staff and wider stakeholders to design solutions and agree timescales, with particular regard to Black, Asian and Minority Ethnic stakeholders. • Finalise and publish actions and the timescales for achieving these in the form of an Anti-racist Action Plan. • Publish progress made in relation to the organisation's plan. • Make use of and disseminate best practice in anti-racism internally and externally, including through wider education and training networks.

Objective	Prompts: Leaders
Organisational plans for becoming anti-racist are effective in addressing racial inequities for Black, Asian and Minority Ethnic stakeholders.	<ul style="list-style-type: none"> • Use the Anti-racist Action Plan as a 'roadmap' for moving the CCH towards becoming an anti-racist organisation rather than the plan being an end in itself. • Ensure the plan is a 'live' document which is adapted and developed in response to, for example, organisational priorities, changing demographic profiles, differential outcomes and learner and staff's lived experience. • Address persistent racial inequities and ensure that robust structures, systems, processes and practices are in place to sustain and build on progress and improvements made. • Place emphasis on setting and achieving outcomes that will contribute to making a long-lasting tangible difference (i.e., have a positive impact). • Try new things when past actions prove ineffective and build on those that have been successful. • Recognise there are always more things to do and achieve in the journey to becoming anti-racist.
Learning and work environments are ethnically inclusive.	<ul style="list-style-type: none"> • Facilitate honest constructive conversations about race and racism between diverse groups of learners and staff, engendering optimism and channeling passion and discord. • Provide safe spaces for conversations about race, racism and anti-racism within the learning and work environment. • Develop a culture where ethnic diversity is valued, and the achievements of diverse groups are celebrated and profiled. • Raise awareness throughout the organisation of what constitutes racial discrimination, harassment and bullying including microaggressions and banter, both of which are all too prevalent in learning and work environments. • Communicate that racism, including microaggressions and banter, is not tolerated and take action to address hostile learning and work environments. • Encourage staff and learners to report all incidents of racist discrimination, harassment and bullying, including microaggressions and banter. • Ensure Black, Asian and Minority Ethnic people's lived experience of racism is not trivialised and that all complaints are treated seriously and in a culturally sensitive way. • Provide safe ways to report incidents of racist bullying, harassment and discrimination. • Respond to and act on all incidents of racism. • Ensure that qualitative and quantitative data concerned with racist incidents are closely monitored and reported on, along with the impact of actions taken.

Lived experiences of racism

"A number of staff and learners described experiencing racially-driven name calling and jokes, framed as 'banter'. In several cases, learners who had been victims of overt racism described ultimately landing in trouble themselves, having become angry and frustrated. Some staff had learnt how to dampen their response for this reason, creating a build-up of frustration."

"The (to use a learner's phrasing) 'drip, drip, drip' impact of microaggressions and covert racism was described with considerable frequency, tending to relate to staff: staff and learner: learner interactions. It was felt that such incidents can appear trivial when individually examined, making it hard for victims or witnesses to articulate or call-out such racism. Due to this, the pattern goes unchecked and perpetuates itself."

Extracts from "Towards Anti-racist Further Education: Qualitative research on the lived experience of learners and staff" [towards-anti-racist-further-education-qualitative-research-on-the-lived-experiences-of-learners-and-staff.pdf](#) (gov.wales)

Using a variety of mechanisms for reporting racism

Some organisations provide a number of mechanisms for reporting racism-formal reporting procedures and processes and less formal mechanisms such as complaints boxes or surveys. The latter provide understanding of the culture and climate of the organisation and should, along with issues identified through formal processes, be acted upon.

Dealing with and challenging racism

Useful resources:

TACKLING RACIAL HARASSMENT AND BULLYING A toolkit for employers, Business in The Community, 2018 [BITC-race-toolkit-tacklingracial_harassmentandbullying-Oct2018.pdf](#)

Guide to good practice : [Tackling racism, EWC, November 2021 file](#) (ewc.wales)

Videos that can be used with learners and staff, Show Racism the Red Card [Voices - Find Hope & Support \(theredcard.org\)](#)

SECTION // 2

LEARNING PROGRAMMES



This section of the guide is concerned with providing equitable learning experiences and outcomes for all learners. It covers the following aspects of learning programmes: design and delivery, resources, assessment, pedagogy and physical and digital learning environments.

The prompts in this section assist evaluation of the extent to which learning programmes promote contemporary values and anti-racism, explore the impact of racism on Black, Asian and Minority Ethnic and white communities, include the contributions made by Black, Asian and Minority Ethnic people to society and prepare learners for life and work in an ethnically diverse society.

“Education alone cannot address the social, cultural and structural factors that sustain racial inequality. However, education can take us a long way forward in producing the ethical and informed citizens of the future.”

Professor Chalotte Williams, OBE

Chair of the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group.

Learning Programmes

Objective	Prompts: Programmes
Relevant, accessible programmes enable all learners to achieve and progress.	<ul style="list-style-type: none"> • Provide a range of learning opportunities that are relevant to local, regional, national and global labour markets and meet the needs and interests of Black, Asian and Minority Ethnic learners. • Ensure clear progression routes from foundation through to higher level learning and to work. • Are actively promoted to Black, Asian and Minority Ethnic people and community groups through targeted communications and engagement events. • Provide ambitious, challenging and demanding content for all learners which promotes anti-racism and contemporary values. • Are planned with employers, ensuring that both on-the-job and off-the-job training promote anti-racism and contemporary values. • Offer in-person and/or digital learning opportunities and support. • Are accessible to people with diverse language backgrounds, supporting them to gain the knowledge and skills needed for progression to higher-level study and work.

Objective	Prompts: Programmes
<p>The outcomes of learning prepare learners for life and work in an ethnically diverse society.</p>	<ul style="list-style-type: none"> • Whilst meeting awarding requirements cover, wherever possible, contemporary values and the contribution made by Black, Asian and Minority Ethnic people to society. • Increase understanding of what constitutes racism and its impact on Black, Asian and Minority Ethnic and white communities. • Promote anti-racist values, attitudes and behaviours. • Develop the knowledge, skills, behaviours and attitudes that enable learners to interact appropriately and work with people from diverse ethnic groups. • Include frequent progress reviews with learners and their employers, including a review of the learner's acquisition of the knowledge, skills, behaviours and attitudes needed for life and work in an ethnically diverse society and increasingly global labour market. • Are reviewed regularly through the 'lens of anti-racism' taking into account honest feedback from learners and staff, with particular regard to the Black, Asian and Minority Ethnic learners and staff. • Are updated in light of feedback from learners and other stakeholders.
Objective	Prompts: Resources
<p>Resources, including digital resources, promote contemporary values and anti-racism.</p>	<ul style="list-style-type: none"> • Reflect the ethnic demographic, identities, experience and interests of learners and the wider community. • Present positive content about and images of people from diverse ethnic groups. • Are reviewed regularly through the 'lens of anti-racism' taking into account honest feedback from learners and staff, with particular regard to the Black, Asian and Minority Ethnic learners and staff. • Are updated in light of feedback from learners and other stakeholders.

Objective	Prompts: Assessment
Assessment is fair and equitable.	<ul style="list-style-type: none"> • Is culturally inclusive, using a wide range of appropriate methods. • Does not focus solely on written skills, particularly when assessing practical competencies. • Is transparent with purpose, process and criteria for success clearly stated. • Is supported by detailed feedback to learners on what they have done well and what needs to be improved, with clear targets set for future assessments. • Is monitored by ethnicity and where outcomes and lived experience identify racial inequities in the methods or processes used, action is taken to redress these inequities. • Is reviewed regularly through the 'lens of anti-racism' taking into account honest feedback from learners and staff, with particular regard to the Black, Asian and Minority Ethnic learners and staff. • Is updated in light of feedback from learners and other stakeholders.
Objective	Prompts: Leaders, teachers and assessors
Pedagogy has a positive impact on the experiences and outcomes of all learners.	<ul style="list-style-type: none"> • Undertake training on anti-racist pedagogy. • Collaborate and share practice on anti-racist pedagogy through professional learning networks. • Understand and reflect on their own bias, identifying a) how this affects choices about what is taught and how it is taught and b) in light of this, how to ensure practice is ethnically inclusive. • Reflect on and resist using language and practices that marginalise or exclude Black, Asian and Minority Ethnic learners. • Cultivate an ethnically inclusive learning environment, using teaching, learning and assessment strategies that engage all learners. • Review the impact of teaching, learning and assessment practice on learners' experiences and outcomes and where there are racial disparities, take action to address these.

Objective	Prompts: Leaders and staff
<p>The behaviours of leaders and staff are conducive to building an equitable, anti-racist learning environment.</p>	<ul style="list-style-type: none"> • Establish safe, inclusive physical settings and digital spaces/platforms where the identities, experiences and backgrounds of all learners are valued. • Have a shared understanding of the way in which racial inequities may be manifest in learning programmes and environments and how to address these in the design and delivery of programmes and in resources, learning and activities. • Have clear and agreed strategies in place for dealing with racist language and behaviours. • Facilitate honest constructive conversations about challenging topics between diverse groups of learners, engendering optimism and channeling passion and discord.

The Anti-racist Metaverse: a resource for practitioners and learners in Wales.

The anti-racist metaverse developed by Cardiff and Vale College Group (CAVC) provides a unique immersive learning experience. This Welsh Government backed project promotes anti-racism and contemporary values, preparing learners for life and work in an ethnically diverse society. It is intended to be used in further education, work based learning and commercial settings.

The content for the metaverse was designed collaboratively by subject specialist teams from CAVC and other post 16 institutions, many of whom have lived experience of racism. As well as providing personal development opportunities, the metaverse contains vocationally related materials to support learners in gaining the knowledge, skills, attitudes and behaviours they need for work in an increasing global world.

The metaverse's four sections can be used by practitioners and learners to enrich learning in class-based sessions and digital environments. The four sections are:

- The Grand Atrium Courtyard which brings together history, culture and identity and allows staff and learners to interact with key figures such as Nelson Mandela and Betty Campbell. Along with providing inspirational stories and role models for learners from diverse backgrounds, the courtyard draws upon and stimulates discussion on the intellectual capital of Black, Asian and Minority Ethnic people in Wales, the UK and globally.
- The Experiences Metaverse is designed to look like a typical Welsh street comprising six different houses, each with a resident who has their own personal story. The houses have been designed with the resident in mind to help bring their individual lived experiences of racism to life. The houses contain items that are meaningful to the individual's story. Staff and learners are encouraged to ask questions and click on items in the room to see why they are significant. These details, similar to a game, make the experience truly authentic and immersive. The Experiences Metaverse can be used in personal development, tutorial and ERR sessions to examine issues of race and racism and what it means to be anti-racist.
- The Immersive Studies Metaverse enables staff and learners to explore the relationship between maths, science and nature as well as augmented reality options, e.g., through an area exploring different hair types and makeup styles and one which explores the artefacts on Lewis Latimer's desk. Latimer, a contemporary of Thomas Edison, invented the carbon filament light bulb (the product most like the lightbulbs we use today which lasted hours, even days, in comparison to Edison's invention which lasted mere seconds). It is his story that defined the approach to the metaverse and the achievements that are hidden from history. Filtering or 'washing' history has a profound impact on the design of the curriculum, which in turn shapes what learners believe to be true. It affects collective understanding of the worth and value of diverse global cultures, which is why such importance has been placed on sharing a balanced and engaging version of global history.
- The World Timeline Metaverse includes four regions (Africa, Indian Subcontinent, Middle East and Northern Europe) and consists of four time periods allowing staff and learners to experience representative architecture, imagery and information related to ancient, medieval, early modern, and modern times. It broadens understanding and appreciation of diverse cultures and their contributions.

Adapted from the Jisc blog by Yusuf Ibrahim, Assistant Principal CAVC and Project Lead, February 2024 and the metaverse website. Link to the metaverse website [https://www.antiracism.wales/"Wales \(antiracism.wales\)](https://www.antiracism.wales/)

SECTION // 3

ORGANISATIONAL SYSTEMS, POLICIES AND WAYS OF WORKING



This section of the guide is concerned with the extent to which organisational structures and systems ensure fair and equitable treatment for Black, Asian and Minority Ethnic people. It covers organisational structures and ways of working, the policy framework, recruitment processes and quality assurance systems.

Organisational systems, policies and ways of working

Objective	Prompts: Leaders
Organisational structures and ways of working build a strong foundation for anti-racism.	<ul style="list-style-type: none"> • Identify a senior lead for anti-racism with the authority to act who has support from colleagues with expertise in learning, quality assurance, HR, stakeholder management and MIS. • Allocate sufficient resources to anti-racism work (e.g., time, training, materials or support). • See anti-racism as everyone's responsibility, not just that of Black, Asian and Minority Ethnic staff or those with racial equity and/or broad equality remits. • Make responsibilities and lines of accountability for anti-racism explicit, e.g., in job descriptions, person specifications, line management arrangements, remits of boards and committees and in contractual arrangements and reviews with subcontractors. • Ensure responsibilities and accountabilities for anti-racism are understood by all stakeholders, including subcontractors. • Ensure all staff and subcontractors are set targets for anti-racism and where there are racial inequities, to address these. • Establish committees and boards with a remit for racial equity and anti-racism, ensuring they are credible, have the authority to act and are led by and made up of those with real insight and expertise in this area of work. • Ensure Black, Asian and Minority Ethnic staff, learners and stakeholders are represented in the decision making process at all levels of the organisation, e.g., at managing director level, in leadership posts and on key policy making boards and committees. For learners, this includes learner representative and learner council roles.

Objective	Prompts: Leaders
<p>Organisational policies unequivocally communicate a responsibility and commitment to promote racial equity and anti-racism and set out the objectives for doing so.</p>	<ul style="list-style-type: none"> • Include the organisation's commitment to and vision, values and objectives for racial equity and anti-racism in existing equalities and equal opportunities policies and/or develop a racial equity/anti-racism policy. • Review all current and proposed policies and practices through the 'lens of anti-racism' to ensure they reflect the organisation's vision, values and objectives for racial equity and anti-racism. • Ensure that policies for conduct (staff and learner) cover the procedure for reporting on and responding to incidents of racial discrimination, bullying and harassment, including microaggressions. It is a requirement of the Anti-racist Wales Action Plan's Core Action 5 for Leadership that these policies be validated to the satisfaction of Black, Asian and Minority Ethnic stakeholders (e.g., learners, parents, staff and other stakeholder organisations and networks). • Ensure all policies are applied equitably and monitor their implementation to ensure this is the case. • Undertake race equity impact assessments of all policies. Where risks are identified, record actions taken to minimise identified risks and ensure control documents include the date the assessment was completed. • Ensure subcontractors adhere to and implement the organisation's policies. • Ensure staff at all levels undertake professional development and leadership programmes that equip them in a) dealing with racism and b) promoting anti-racism.
Objective	Prompts: Leaders
<p>Organisational recruitment processes ensure Black, Asian and Minority Ethnic people are represented at all levels.</p>	<ul style="list-style-type: none"> • Ensure the workforce is reflective of the organisation's current and future ethnic profiles across disciplines, roles and levels. • Ensure that staff involved in recruitment are skilled in implementing processes that are anti-racist and training is undertaken in anti-racist recruitment practices. • Ensure workforce strategies incorporate targeted support for Black, Asian and Minority Ethnic staff to develop and enhance their careers and to succeed in their roles. • Monitor and review each stage of the recruitment process, identifying any barriers and where these exist, take action to address them. • Seek and listen to the lived experience of Black, Asian and Minority Ethnic staff and communities, engaging them in solutions to redress racial inequities. • Report on and publish progress on addressing workforce representation.

Objective	Prompts: Leaders
<p>Quality assurance is used effectively, ensuring equitable experiences and outcomes for learners, staff and communities.</p>	<ul style="list-style-type: none"> • Develop quality assurance systems that cover all aspects of the learner journey and the staff experience. • Measure, monitor and review the effectiveness of programmes, resources, pedagogy, assessment and learning environments in enabling all learners to realise their full potential and achieve the outcomes needed for life and work in an ethnically diverse society. • Measure, monitor and evaluate the effectiveness of organisational structures, systems, policies and practices in ensuring equitable treatment of all learners, staff and communities. • Engage and involve Black, Asian and Minority Ethnic learners, staff and communities in quality assurance processes to ensure their lived experience is heard and acted upon, and that they participate in co-designing solutions. • Identify and redress racial inequities in participation, outcomes, representation and/or experiences. • Report on and publish progress on addressing racial inequities.

SECTION // 4

DATA



Data play a critical role in shaping organisational strategy and plans for becoming anti-racist. Data should firstly inform the interventions organisations take to effect change and secondly, be used to evaluate the success of these interventions and whether alternative courses of action are required. Section 6 provides more detail on using ethnicity data throughout the action planning cycle.

This section of the guide provides an overview of the use of ethnicity data to redress racial inequities and racism, along with obligations to publish data. At minimum, organisations should publish data on learner outcomes and destinations, recruitment and workforce representation and turnover, board representation, disciplinary, grievance and complaints procedures and incidents of bullying harassment and discrimination.

Data

Objective	Prompts: Leaders
<p>Ethnicity data are used effectively throughout the organisation, supporting equitable experiences and outcomes for Black, Asian and Minority Ethnic learners, staff and communities.</p>	<ul style="list-style-type: none"> • Ensure that processes for collection of ethnicity data are robust and where there are gaps, put in place systems to address these gaps. • Adhere to data protocols at all times. • Evaluate ethnicity data, wherever possible, at a granular level. • Monitor, report on and publish quantitative and qualitative ethnicity data, including at minimum those associated with learner outcomes and destinations, recruitment and workforce representation and turnover, board representation, disciplinary, grievance and complaints procedures and incidents of bullying harassment and discrimination. • Use ethnicity benchmarks as part of the evaluation of organisational performance. • Use regional ethnicity benchmarks, where possible, when evaluating participation of learners and workforce representation to take account of variations in regional ethnic demographics. • Get feedback from Black, Asian and Minority Ethnic learners, staff and communities on their lived experience. • Identify racial inequities, including persistent imbalances in participation, outcomes and workforce representation. • Involve Black, Asian and Minority Ethnic learners, staff and communities in designing solutions to address any racial inequities. • Develop the roadmap (the plan) for addressing any racial inequities, ensuring that actions are SMART and address the cause of the problem. • Review the outcomes for and impact of the actions taken and where needed, identify alternative courses of action. • Publish, on an open/accessible forum/platform, a report on progress which includes quantitative and qualitative ethnicity data.

SECTION // 5

WORKING WITH SUBCONTRACTORS AND EMPLOYERS

Working with subcontractors

The CCH must share the Anti-racist Practice Guide with the organisations to whom they subcontract apprenticeship provision as the objectives and prompts in each section of the guide apply equally to these delivery partners. CCHs must ensure that subcontractors' commitments to racial equity and anti-racism are demonstrated in their systems, policies, processes and practices and by equitable experiences and outcomes for Black, Asian and Minority Ethnic learners, staff and communities. Subcontractors are expected to ensure that organisational statements demonstrate a commitment to promoting anti-racism (see CCH Anti-racist Action Plan, Goal 3, 3.1) and these must align with the CCH's principles for anti-racism.

There are a number of ways that CCHs can ensure that their subcontractors have the strategic framework and culture to support anti-racist work. These include, for example,

- Formal validation by the CCH of the subcontractor's systems, policies, processes and practices, ensuring that these adhere to the CCH's vision, values and objectives for racial equity and anti-racism.
- Development of joint systems, policies, processes and practices for racial equity and anti-racism.
- Adoption by the subcontractor of the CCH's systems, policies, processes and practices for racial equity and anti-racism.

Whichever approach is used, the CCH will need to closely monitor the implementation and impact of each subcontractor's strategic framework and culture on participation and outcomes for learners, workforce representation and the experiences of learners, staff and communities. Where racial inequities are identified, the CCH must ensure each subcontractor takes immediate action to address these. It is important that when addressing racial inequities, that CCHs identify issues by individual subcontractor and incorporate these and the corresponding actions within their Anti-racist Action Plan. The CCH should then monitor, evaluate and report on the progress each subcontractor has made in redressing the inequities.

It is equally important the CCH and their subcontractors share practice within and beyond the partnership. This should involve sharing, for example:

- Practice concerned with developing learning programmes, resources, assessment, pedagogy and learning environments that promote anti-racism and contemporary values .
- Strategies and activities for increasing recruitment of and outcomes for Black, Asian and Minority Ethnic learners .
- Strategies and activities to support development of an ethnically diverse workforce.

Working with employers

CCHs have a key role to play in advancing racial equity and anti-racism in employment practices. Many employers welcome advice and guidance on racial equity and anti-racism, recognising that an ethnically diverse workforce is good for business. CCHs have the opportunity to share and inform practice, as well as work with employers to develop new provision that responds to labour market needs. There is significant scope to develop provision in high value sectors that will benefit the economy of Wales, address shortages in the labour market and attract new entrants, particularly those who might traditionally have taken a degree route into the field.

CCHs also must use their quality assurance systems to monitor the experiences of Black, Asian and Minority Ethnic learners in the workplace, including experiences of on-the-job training. It is critical that the CCH talk to Black, Asian and Minority Ethnic learners to understand these lived experiences and where needed, work with the employer to provide a more equitable , anti-racist work environment.¹⁵ CCHs need to ensure they provide opportunities for learners to discuss race and racism and that learners feel safe to do so.

15. Black, Asian and Minority Ethnic learners reported that they encountered racism in the workplace, including racist microaggressions and banter in lived experience interviews , see "[towards-anti-racist-further-education-qualitative-research-on-the-lived-experiences-of-learners-and-staff.pdf\(gov.wales\)](#)"

CCHs should involve employers in quality assuring the whole of the learner journey, with a focus on ensuring equitable experiences and positive outcomes and destinations for all learners. This will enable the CCH and the employer to identify where racial inequities lie and priorities for action. These actions should be incorporated within the CCH's Anti-racist Action Plan with employers involved in assessing the impact of the actions taken in redressing persistent racial inequities, including actions aimed at tackling persistent gaps in attainment.

Close partnership working with employers provides opportunities for sharing anti-racism practice and for establishing employer networks for this work. CCHs should profile the work they do with employers on increasing ethnic diversity and promoting anti-racism through a variety of media.

SECTION // 6

ACTION PLANNING

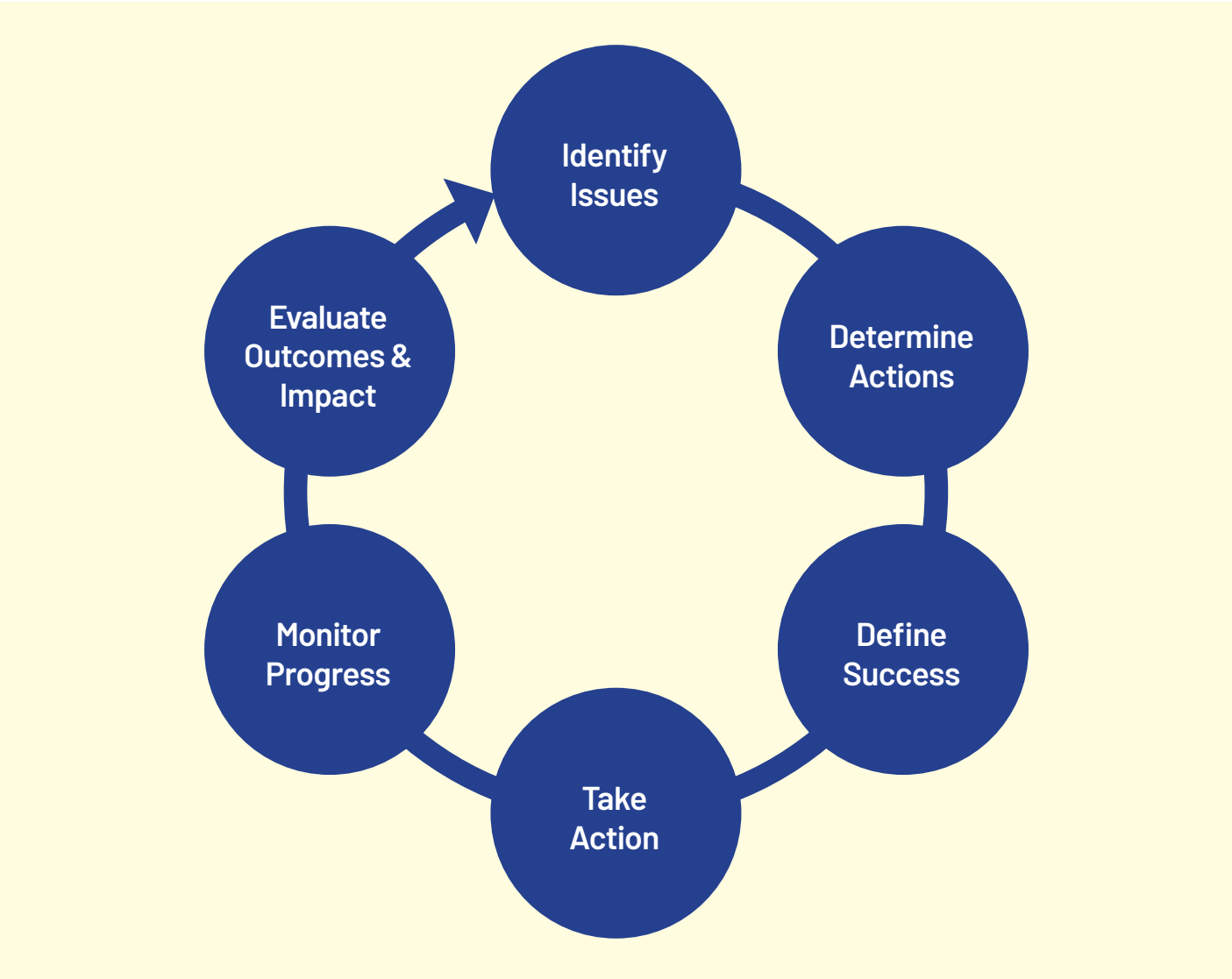
This section of the guide aims to help CCHs develop robust, evidence -based Anti-racist Action Plans. Too often, action plans are statements of commitment and do not contain actions that will lead to change. Change will only occur if everyone understands what the problems are , why they occurred and how they need to be tackled.

Developing a robust, evidence- based plan

Effective action planning is based on a thorough appraisal of where the organisation currently stand, where they want to be and what they need to do to get there. This process needs to be steered by senior leaders and involve all stakeholders, with particular regard to Black, Asian and Minority Ethnic learners, staff and community stakeholders.

The broad stages in the process are illustrated in Diagram 1.

Diagram 1: Stages in the action planning process



Guidance on the stages is provided below.

Identifying issues

In developing their anti-racist action plan, CCHs should:

- determine where individuals, teams and the whole organisation are in relation to taking the necessary steps to become anti-racist,
- identify their areas of foci and priorities within these for addressing racial inequities and promoting anti-racism, and
- identify practice that can be built upon.

Leaders and staff should draw on a wide range of evidence to support this stage of planning, e.g., commitments, policies, processes and ways of working along with associated quantitative and qualitative ethnicity data. Quantitative data tell us the 'what' – for example, the success rate of 62.0% for Asian/Asian British/Asian Welsh learners is below the national average and 4.0% below the success rate for white learners. Qualitative data tells us the 'why' – e.g., issues identified through the lived experience of learners and staff, audits of work, feedback from assessors and feedback from employers. These inform the 'how' – how to fix the problem. If, for example, lived experience and an audit of assessments show that assessors do not use a variety of assessment methods and evidence, the action might be to increase success rates by from x% in 2023 to X % in 2024 for x group or groups by ensuring that assessments use a range of methods and do not rely solely on written work where other forms of assessment may be more appropriate, e.g., observing a practical on the job task.

Analysis of ethnicity data is the starting point and critical to evaluating and understanding the impact of current systems, policies, processes and practices upon the lived experience of Black, Asian and Minority Ethnic learners and staff. CCHs should draw on a wide range of quantitative and qualitative ethnicity data to support planning, including data for:

- learner participation, progress, outcomes and destinations,
- learner participation, compared with those for Wales and where possible, the region,
- staffing profiles overall and by level,
- board/managing director profiles,
- staffing and board/managing director demographic profiles compared with those for learners and that for Wales,
- staff recruitment and selection processes,
- incidents of racist discrimination, bullying and/or harassment including microaggressions,
- the ethnicity pay gap,
- training and development,
- lived experience (e.g. through surveys, conversations, networks and advisory bodies),
- Learner and Staff Voice (e.g., surveys, fora and advisory bodies),
- observations of learning activities including assessment, audits of learning resources, assessments and learners' work and target setting in performance reviews, and
- other internal or external activities advancing anti-racism.

It is important that leaders identify any gaps in their evidence base and incorporate actions for developing these within their Anti-racist Action Plan.

Determining actions and defining success

Determining actions and defining success are at the heart of effective action planning. These stages go hand in hand, ensuring that the actions identified include what success looks like. The purpose of taking action is to have a positive impact, to make a change. For example, if an organisation intends to increase success rates for learners, they need to state by how much, make clear the actions they will take to ensure success rates increase and the date by which the improvement will take place. An action to 'Increase success rates for Black, Asian and Minority Ethnic learners by monitoring data' without defining and identifying actions to address the issues underpinning the data is likely to result in continuous monitoring but little in the way of positive outcomes or impact.

Actions need to adhere to the SMART principles:

- Specific
- Measurable
- Achievable
- Relevant
- Time-bound

In applying these principles, CCHS need to ensure:

Actions are specific

- a. Actions must state exactly what the CCH intends to do and achieve in each year of their plan. Smaller steps (milestones) may be needed to support broad actions, particularly those covering substantial pieces of work. Examples of substantial pieces of work that require milestones are a review of all policies, an audit of all assessment plans and learner reviews or a review of entry criteria across all qualifications/levels.

Actions are measurable

- b. Actions must be measurable; that is, they contain the measure for success and focus on outcomes and impact vs solely outputs. Outputs tend to be the products or activities arising from an action, for example, 'report written', 'handbook produced', 'new policy developed', 'training module in place', 'three meetings held' and/or 'review completed'. Outcomes are the short to medium term measurable changes made as a result of the actions taken. Impact concerns the longer term effect of actions. Where possible, outcomes and impact should include quantitative measures.

The difference between outputs, outcomes and impact is illustrated by the following example:

An organisation establishes a mentoring programme for Black, Asian and Minority Ethnic staff as one in a series of actions to address lack of representation at middle and senior leadership level (currently the organisation has no Black, Asian or Minority Ethnic middle or senior tier managers).

Outputs: The mentoring programme is established. e.g., mentors in senior leadership roles appointed, mentoring guidance and materials produced, mentors trained, programme launched with potential mentees identified and contacted by HR.

Outcomes: The number of Black, Asian and Minority Ethnic members of staff mentored, evidence of positive feedback on the programme from mentees, the number of mentees applying for middle management posts.

Impact: Evidence of Black, Asian and Minority Ethnic staff's confidence in the equity of recruitment and selection processes for leadership/management roles (improvement in baseline ethnicity data from previous staff perception surveys and/or feedback from lived experience surveys and structured interviews), improved conversion rate for Black, Asian and Minority Ethnic applicants from application to appointment for leadership positions from x % in 2024 to x% in 2025 and/or an increase in the number of Black, Asian and Minority Ethnic staff appointed to middle/management positions by 2025 with a year on year comparison.

Actions are achievable

- c. Actions must be ambitious, yet achievable within the resources and timescales allocated. For example, if an organisation employing 300 staff have only two Black, Asian and Minority Ethnic staff, setting a success measure of increasing the percentage to 5.0% by the end of the year is unrealistic (this would mean employing 13 additional members of Black, Asian and Minority Ethnic staff over the course of one year). It is more realistic to target an increase of two to three staff in the first instance. In circumstances such as these, CCHs may find it helpful to set measures in terms of numbers of staff vs percentages of staff. Where actions are constrained by internal and/or external circumstance, e.g. a freeze on staffing, actions may be about building the foundation to support recruitment of Black, Asian and Minority Ethnic people as vacancies arise. Actions could include engagement activities, e.g., with three Black, Asian and Minority Ethnic community groups and networks (identify and name the groups/networks in the plan), developing and using a blind recruitment process and/or introducing practical assessment tasks. Actions would be based on those barriers to recruitment and selection that the organisation has identified through a review of ethnicity data at each stage of the process including feedback from/ lived experience of Black, Asian and Minority Ethnic applicants.

Actions are relevant

- d. Actions must be based on evidence and be relevant to the desired outcome. This may mean looking at data at a granular level, for example data show that the success rate for a specific group of Black, Asian and Minority Ethnic learners is low. Discussion with learners identify that they feel assessment methods should be more varied and currently focus too much on paper based evidence. They also want more detailed feedback and more frequent reviews. Audits of the assessment regime, learner portfolios and the review timetable and assessment records

show this to be the case. The action should therefore be concerned with addressing assessment issues to improve the success rate for the group concerned, for example 'to increase success from x% in 2023/24 to x% in 2024/25 for x ethnic group by: revising current assessment methods to ensure a balance between practical and written assessments, holding more frequent reviews and providing more detailed written feedback to learners. As well as monitoring success data, two lived experience groups will be held to seek learners' views on the new approach to assessment. An audit of assessment and review documentation will be undertaken to ensure they are at the agreed standard.'

Actions are time-bound

- e. Setting specific timescales provides a clear indication of when actions will be implemented, completed and reviewed, and the date by which success should be achieved. End dates must not be 'ongoing' or 'continuing'. Where actions span a number of years, milestones should be set to support monitoring and completion. Where actions have not been achieved, they need to be recorded as 'not achieved'.

Taking action

It is critical that individuals with suitably influential roles are given responsibility and are accountable for actions and driving them forward. Monitoring should be through the line management structure. Taking action to address racial inequities and monitoring of and reporting on progress must be a feature of performance review/appraisal systems and 1:1 line management meetings and for subcontractors, contract review meetings. Every member of staff, including those of subcontractors, should have targets for racial equity and anti-racism.

Monitoring progress

The board/managing directors and leaders at all levels must closely monitor the implementation of the Anti-racist Action Plan across the organisation, within teams and by subcontractors. The purpose of monitoring is to ensure that the actions taken have the desired impact and that anti-racist practices are fully embedded.

The Anti-racist Action Plan should be a 'live' document which is updated as issues are identified and/or arise, requiring leaders at all levels to ensure the plan informs and is informed by strategy, decision-making and practices.

Evaluating outcomes and impact

The outcomes and impact of actions should be evaluated by the leads for each action, with involvement from their teams. Leads must determine whether actions have been achieved or not achieved and produce a brief evaluative statement with evidence supporting their judgement. Terms such as 'in progress,' progressing' and 'ongoing' must not be used in evaluations.

An example of an evaluation is provided below:

The action is to support better collection of staff ethnicity data with the proportion of practitioners declaring their ethnicity increased from 85% in 2023 to 95% by July 2024.

Evaluation: 'Not achieved: 88% of practitioners declared their ethnicity against a target of 95%. The following actions will be put in place from September 2024 to increase disclosure to 95% by January 2025 - brief statement on actions.'

The initial evaluation then needs to be validated through the organisation's quality assurance processes. Validation should involve senior managers and the board/managing directors as well as other stakeholders.

Where the action and success measures are achieved, leaders need to consider how to best take their ambitions forward through new, challenging actions and measures. Where measures are not achieved, these and the actions set should be reviewed to determine whether other interventions will better tackle the issues identified.

Applying an anti-racism lens

In developing, reviewing and evaluating their plans, CCHs should apply an anti-racism lens to the a) identification of issues and the interventions needed to address these and b) evaluation of the outcomes and impact of the interventions taken. As well as involving and engaging Black, Asian and Minority Ethnic stakeholders in review and development processes, involvement of an internal or external 'critical friend' provides for objective scrutiny of the evidence base, and the efficacy of the interventions made. Critical friends must have expertise in and insight into racial equity and anti-racism.

Adopting a critical, challenging but supportive approach will support CCHs in developing plans that address lived experiences of racism, are based on shared anti-racist principles and values and cultivate equitable and inclusive environments for all learners and staff.

APPENDIX // 1

FURTHER GUIDANCE ON CORE ACTIONS FOR LEADERSHIP



Overview

The Welsh Government has set five Core Actions for Leadership in the Anti-racist Wales Action Plan for the wider public, third sector and Government funded private sector. Each core action sets a 'standard' for what is expected of leaders and leadership.

The core actions respond to issues raised in consultation responses prior to finalisation of the Anti-racist Wales Action Plan:

"The consultation responses suggested that the failure to reduce racism was due, in part, to government, public, private and third sector organisations not fully meeting their duties under the Equalities Act 2010. It was suggested that the Public Service Equality Duty under the Equality Act 2010 needed to be fully met, and that the powers under the Act should become central to the implementation of this Plan. We agree. We will ensure that we hold ourselves, and those we fund, to account in meeting this Duty. To help with this, we have identified a set of five core actions for all public bodies to progress, linked directly to the provisions of the Equality Act 2010. Our newly established Race Disparity Evidence Unit will track progress with this."¹⁶

CCHs have an obligation to meet the Core Actions for Leadership and should evaluate where they stand in relation to each action as part of their Anti-racist Action Plan. The focus of self-evaluation and the actions arising from it must be on anti-racism vs broader equality, diversity and inclusion matters.

Further guidance for each core action is set out below to assist self-evaluation prior to action planning.

Core Action	Further Guidance
Core Action 1 A strong commitment to lead from the front and demonstrate it in terms of anti-racist values, behaviours, representation at all levels of your organisations and accountability measures.	Core Action 1 is concerned with demonstrating leadership of anti-racism at all levels within the organisation and includes: <ul style="list-style-type: none">• Creating a cultural shift towards anti-racist behaviours and values.• Making use of positive action where appropriate.• Ensuring representation of Black, Asian and Minority Ethnic people at managing director and senior and middle management level.• Providing organisational, local, regional and/or national leadership of anti-racism.• Embedding ways of working to tackle racism.• Using all levers to tackle racism.• Using data and evidence.• Developing a policy framework to advance anti-racism.• Using funding and grants to support anti-racism work.• Embedding accountability for anti-racism (e.g., job descriptions, person specifications, line management arrangements, remits of boards and committees and in contractual arrangements and reviews with subcontractors).

16. Anti-racist Wales Action Plan, June 2022, page 16.

Core Action	Further Guidance
<p>Core Action 2 Participation in all decision making and senior leadership groups in a way that enables lived experiences of ethnic minority people to be heard and acted upon.</p>	<p>Core Action 2 is concerned with representation of Black, Asian and Minority Ethnic people in managing director and senior leadership positions, as well as leaders at all levels and on other decision making bodies – committees, advisory groups, networks etc. It is also about how leaders at all levels in the CCH ensure the lived experience of Black, Asian and Minority Ethnic people are heard and acted upon.</p> <p>Where Black, Asian and Minority Ethnic people are not represented in decision making and senior leadership groups, CCHs must demonstrate what they are doing to address this racial inequity. The actions they are taking and the success measures for these actions should be included in their Anti-racist Action Plan.</p>
<p>Core Action 3 Achieve, at the very least, minimum requirements of the Equality Act 2010 and publish your results in an open and accessible forum/platform.</p>	<p>The Welsh Government expects all organisations to demonstrate how they will ensure at least minimum compliance with the Equality Act 2010 and take actions to tackle racism and monitor actions annually.¹⁷ Core Action 3 requires that all funded organisations and publish anti-racist statements and action plans in an open and accessible forum/platform.¹⁸ The statement and plan should make clear the organisation's objectives for racial equity and anti-racism and the actions they will take to achieve their objectives. CCHs need to ensure that their statements and plans include what their subcontractors are doing to address racial inequities and become an anti-racist organisation.</p>
<p>Core Action 4 Ensure minimum standards and provision of culturally sensitive and appropriate services, including provision of translation and interpretation.</p>	<p>Core Action 4 is concerned with engaging Black, Asian and Minority Ethnic people and ensuring services are delivered in a culturally appropriate, sensitive way. For education and training, this means organisations should consider the extent to which they:</p> <ul style="list-style-type: none"> • provide advice and guidance sessions tailored to the needs of specific ethnic groups, including in community settings, • support access to and progression in learning through the design and delivery of their learning programmes, including meeting the needs of ESOL, refugee and immigrant learners, • establish close links with their diverse communities, • meet religious and other cultural needs (for example, in facilities and assessment arrangements), • provide or have links for translation/interpretation services in community languages, • take action to mitigate potentially adverse effects of policies and practices in relation to ethnicity, • provide staff training to increase cultural awareness and sensitivity, recognising diverse ethnic groups' needs, and • incorporate anti-racism within learning programmes.

17. Anti-racist Wales Action Plan, June 2022, page 28.

18. Anti-racist Wales Action Plan, June 2022, page 35

Core Action	Further Guidance
<p>Core Action 5 Ensure robust complaints policies and processes for racial harassment that are validated to the satisfaction of ethnic minority groups.</p>	<p>Core Action 5 is about ensuring that all complaints policies and processes for racial harassment:</p> <ul style="list-style-type: none"> • Make clear that racism is not tolerated, and that action will be taken on all incidents (the Welsh Government expectation is that organisations will have and communicate ‘zero tolerance’ of racism). • Include clear procedures for reporting racism, outlining the types of action that will be taken. • Are co-designed with Black, Asian and Minority Ethnic people. • Are monitored and reported on, along with data on incidents of racism. • Are reviewed at least annually to determine their effectiveness in tackling racism and revised where necessary, with Black, Asian and Minority Ethnic people involved in this process.

19. Anti-racist Wales Action Plan, June 2022, page 6.

APPENDIX // 2

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ADDITIONAL READING & RESOURCES

Literature

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Websites

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BAMEd Network [BAMEd Network – Black, Asian & Minority Ethnic Educators](https://bamednetwork.org/)

Black Apprenticeship Network: [Black Apprentice Network](https://blackapprenticeshipnetwork.org/)

BLG : <https://blackleadershipgroup.com/>

Diversity and Anti-Racism Professional Learning (DARPL): [DARPL – Diversity and Anti-Racism Professional Learning](https://darpl.org/)

Race Alliance Wales (RAW): [Race Alliance Wales – The Wales We Want](https://racealliancewales.org/)

Race Council Cymru: [Race Council Cymru \(RCC\) | Promotion of equality, Community Cohesion, and diversity by the elimination of discrimination on the grounds of race, gender, disability, sexual orientation or religion.](https://racecouncilcymru.org/)

Race Equality First: [Race Equality First | Tackling discrimination and hate crime and promoting the message that Race Equality is a human right.](https://raceequalityfirst.org/)

Race Equality Matters: [Race Equality Matters](#)

Show Racism the Red Card: [Home - Show Racism the Red Card](#)

The Runnymede Trust: [The Runnymede Trust](#)

Zero Racism Wales: [Zero Racism Wales | Now is the time to take a stand](#)

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